

# **EXHIBIT E**

Rough - Bryan Lisa

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R O U G H D R A F T

CONTAINS CONFIDENTIAL MATERIAL

\*\*\* FOR ATTORNEYS' EYES ONLY \*\*\*

CASE: Pelvic Mesh  
DATE: 4/25/13  
WITNESS: Bryan Lisa - Vol. I

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D R A F T

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<p>1 (Document marked for identification 2 as Exhibit T-134.) 3 BY MR. AYLSTOCK: 4 Q. Let's take a look at T-134. 5 MR. AYLSTOCK: I'm sorry I don't have 6 an extra copy. 7 MS. KABBASH: Okay. 8 BY MR. AYLSTOCK: 9 Q. Here this individual Devon Prutzman 10 is coming up with the communications plan related to 11 this FDA mesh notification correct? 12 A. Mm-hmm. 13 Q. And you know that the -- as these are 14 public communications these need to undergo copy 15 review? 16 A. Yes, sir they do. 17 Q. Okay. And you were involved in that 18 copy review? 19 A. I may have been. I was involved in a 20 lot of copy review. I may have been. 21 Q. If it wasn't you, who would it have 22 been? 23 A. It could have been Jennifer Paine. 24 It could have been anybody in regulatory, honestly. 25 Q. There would have been a form filled</p>	<p>1 MS. KABBASH: I'll note your request, 2 although I believe you already have it. But we can 3 take that up later. 4 MR. AYLSTOCK: Okay. We have a lot 5 of SOPs. None of them are historical. They are all 6 the current versions as I understand it. I'd like 7 the version that was in place at this point in time. 8 THE WITNESS: Yeah they are all 9 available electronically in electronic record 10 systems. 11 BY MR. AYLSTOCK: 12 Q. Is there a database? 13 A. Yes, sir. 14 Q. Including the historical ones? 15 A. Yes, sir they should be maintained. 16 Q. And the revision dates? 17 A. It's a controlled system. It's. 18 Q. Is there a name for that system? 19 A. When I was there it used to be called 20 ECCS, Ethicon change control system. 21 Q. It wouldn't be difficult for you when 22 you were there to go back and look at SOPs? 23 A. That's correct. 24 Q. As far as you know, Ethicon is still 25 using that same system?</p>
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<p>1 out for each of these communication items on the 2 copy review, correct? 3 A. There should be, if they are -- if 4 they qualify as copy review, which we have a 5 specific SOP that identifies what is considered copy 6 material, if those qualify, then yes they would -- 7 they would go through copy review. 8 Q. So what is that SOP? 9 A. I don't know off the top of my head. 10 Q. Where would you go to find out? 11 A. The owner of the copy review process. 12 I am not sure who that would have been at this time. 13 It may have been Nancy Leclair at the time. 14 Q. When you go back to your office in 15 Somerville, is there somebody you could ask to find 16 out that information? 17 A. I no longer work there. 18 Q. Is there somebody you could call when 19 you go back to your office to figure that out? 20 A. It would take some digging. I don't 21 know the players in terms of who is -- owns the copy 22 review anymore. I'm no longer employed by Ethicon. 23 MR. AYLSTOCK: I'll just state on the 24 record that I'd like that particular SOP produced by 25 counsel as soon as possible.</p>	<p>1 A. I'm not sure. I don't know. 2 Everyone seems to change systems very frequently. 3 Q. This is the communications plan, do 4 you see that? 5 A. Yes, sir. 6 Q. And -- 7 A. I'm sorry I see an e-mail. 8 Q. An e-mail discussing the 9 communications plan? 10 A. Yes, sir. 11 (Document marked for identification 12 as Exhibit T-135.) 13 BY MR. AYLSTOCK: 14 Q. We are up to T, what's our exhibit 15 number here. 16 A. 135. 17 Q. I marked this one 135? 18 A. That's 135. 19 Q. You were thinking: 20 MS. KABBASH: Can we plan on a break 21 soon Brian? 22 MR. AYLSTOCK: Yeah. 23 BY MR. AYLSTOCK: 24 Q. Does this appear to be kind of who 25 owns what on the communication plan about this FDA</p>

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